

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States District Court
Southern District of Texas
FILED

AUG 12 2011

Clk

BETTY GILL

PLAINTIFF

vs.

Case No.

**REMINGTON COLLEGE HOUSTON CAMPUS, INC
and LASHUNDIA BROOKS**

DEFENDANTS

COMPLAINT

COMES NOW Plaintiff, BETTY GILL, and would show as follows:

JURISDICTIONAL STATEMENT: Pursuant to Title VII and the Age Discrimination and Employment Act, this court has jurisdiction over this cause.

1. Plaintiff Betty Gill is a resident of Hot Springs, Arkansas, Garland County.
2. Defendant Remington College Houston Campus Inc. is a corporation with its principal place of business in Houston, Texas. The registered agent, is CT Corporation System, can be served at 350 N. St. Paul Street, Suite 2900, Dallas, Texas 75201. Defendant Lashundia Brooks is an individual and can be served at Remington College Houston Campus, Inc., 3110 Hayes Rd., #380, Houston, Texas 77082-2782.
3. On or about August 10, 2009, Plaintiff was hired by Dr. Hiram Nall as a cosmetology instructor at the West Houston campus.
4. Plaintiff was a diligent employee and was promoted to Department Chair in September.
5. Dr. Nall was shortly transferred to a different campus.
6. Plaintiff was never reprimanded prior to her dismissal.
7. Defendant Lashundia Brooks replaced Dr. Nall
8. The majority of instructors at the campus were African-Americans.

9. Shortly after her appointment Ms. Brooks began terminating white employees and replacing them with younger employees and/or African-Americans.

10. Plaintiff became the only white employee in a management/supervisory position.

11. On June 24, 2010, Plaintiff was discharged without just cause and replaced with a younger African-American. The sham reason was for a subordinate leaving some products in the hall. Younger and African-American employees who had committed worse infractions were not discharged.

12. Plaintiff alleges the Defendants violated title VII of the Civil Rights Act and the ADEA, 1967.

13. Plaintiff is a white female and sixty four (64) years of age.

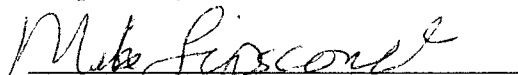
14. Plaintiff has met all conditions precedent. She timely filed a complaint with Equal Employment Opportunity Commission (EEOC). On May 17, 2011 EEOC mailed a dismissal letter and this action is filed within 90 days of her receipt of the letter.

15. As a direct and proximate result of Defendant's acts Plaintiff has suffered mental anguish, loss of earnings and expense in prosecuting this cause.

Wherefore Plaintiff prays:

- a. Process issue and be served on Defendants.
- b. Plaintiff requests a jury trial.
- c. That he recover damages in the amount which may be proved which is in excess of \$75,000.00 together with cost and attorney fees.

Respectfully submitted,



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